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April 24, 2006

Jeff S. Jordan, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 5714

Dear Mr. Jordan:

The undersigned represent the Montana State Democratic Central Committee, and Brenda Schye, as Treasurer (hereinafter referred collectively as "MDP"). This matter was generated by a complaint filed by the Charles Denowh, Executive Director of the Montana Republican Party. Mr. Denowh alleges that the MDP has violated the Federal Election Campaign Act by (1) failing to file monthly reports during the second half of the 2005 calendar year and (2) failing to pay for the salary of Jim Farrell, the MDP's Executive Director, with federal funds. For the reasons stated below, the Commission should take no further action against the MDP and close the file in this matter.

FACTS

The complaint in this matter makes two unrelated allegations against the MDP.

Allegation One – The first allegation against the MDP stems from a television advertisement that was paid for by the MDP that was critical of United States Senator Conrad Burns. The committee admits that it did air an advertisement in August of 2005 that was critical of Senator Burns for taking \$136,000 from lobbyist Jack Abramoff and inserting legislation to give \$3 million to a Michigan Indian tribe. Although the ad referred to Senator Burns by name, it did not reference any election or expressly advocate the election or defeat of any federal candidate.

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Allegation Two – The second allegation involves a vague, conclusory statement that the salary of MDP Executive Director, Jim Farrell, should have been paid with federal funds. Without any support, the complaint alleges: “Based upon my knowledge of the duties of a state party Executive Director and the amount of activity the Montana Democratic Central Committee has had in the Senate race in Montana over the last six months, it is my belief that it is impossible that Mr. Farrell has spent less than 25% of his time per month on Federal election activity.” As discussed below, this claim is insufficient as a matter of law, wholly without merit and is refuted by a declaration submitted by Jim Farrell, which is enclosed as Exhibit A to this letter.

DISCUSSION

A. Failure to File Monthly Reports

The complaint alleges that the MDP failed to switch from a quarterly to a monthly filing schedule during the 2005 calendar year based upon the above-described August 2005 advertisement paid for by the MDP that criticized incumbent Senator Conrad Burns’ legislative effort on behalf of a Michigan Indian tribe. For the reasons stated below, the MDP believes that the Commission should take no further action with respect to this allegation.

1. The origin of the Advertisement

The advertisement at issue in this matter was conceived of, and produced by, the Democratic Senatorial Campaign Committee (“DSCC”). The Committee produced the advertisement prior to approaching the MDP about paying for the airing of the advertisement with funds transferred from the DSCC. The MDP had no role in the creation of the advertisement.

2. Staff Turnover

During the first week of August, the DSCC approached newly elected state chair, Dennis McDonald, about the possibility of running the advertisement critical of Senator Burns. At the time he was approached, Chair McDonald had only been in office for a few days. Furthermore, long time Executive Director, Brad Martin, had resigned a few days prior to Mr. McDonald’s election as chair. Mr. Martin had served as Executive Director for over 12 years and had attended numerous training seminars regarding the federal election law and the Bipartisan Campaign Reform Act of 2002 (“BCRA”). No other staff member had any extensive training in campaign finance requirements at that time and the committee was in a transition period. The committee did not hire a new Executive Director until September 6, 2005.

At the time the DSCC approached Chair McDonald about the ads, he did not have any knowledge of campaign finance requirements, nor did any representative of the DSCC explain the legal implications of paying for the airing of the ads. Ultimately, the MDP agreed to air the ads with funds transferred to it by the DSCC. Of course, the

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advertisements in question were paid for exclusively with funds that are subject to the prohibitions and limitations of the Act.

3. Timing of the Advertisements/Legal Standard

The statutes at issue in this matter are 2 U.S.C. § 431(20)(A)(iii) and 2 U.S.C. § 434(e). Each of these provisions was recently added to the Federal Election Campaign Act ("FECA") by the BCRA. First, a "public communication" that "promotes or supports or attacks or opposes" a federal candidate is considered a "federal election activity." 2 U.S.C. § 431(20)(A)(iii). This has two implications. First, a party committee that engages in such a "federal election activity" must pay for such a public communication solely with federal funds, which is not an issue here. Second, section 434(e)(4) requires that such expenditures be disclosed on a monthly basis.

With respect to the first requirement, it should be noted that Commission regulations do not provide any guidance as to (1) what type of communication "promotes or supports or attacks or opposes" a federal candidate nor does it (2) provide any guidance as to what constitutes a "candidate" for purposes of this section. The advertisement at issue in this matter does not reference any election or advocate the election or defeat of any federal candidate. Furthermore, the advertisement aired more than fifteen months before the next general election. Rather, the advertisement criticizes an incumbent United States Senator for introducing legislation that benefited Michigan clients of Jack Abramoff. Without any standard from which to judge the meaning of the term "promotes or supports or attacks or opposes" a federal candidate, the MDP was in no position to understand whether this advertisement met the statutory definition found in 2 U.S.C. § 431(20)(A)(iii). Nevertheless, for purposes of this response only, the MDP is not asserting that this advertisement is not subject to the first prong of this statutory provision as the reason for the Commission to take no further action and close the file.

More importantly, what is less clear is whether the advertisement relates to a federal "candidate." First, as stated above, the advertisement was run more than fifteen months before the next general election in which Mr. Burns would appear on the ballot, and given Mr. Burns' age and lack of popularity, it was doubtful that he would seek re-election. Second, Senator Burns had not taken any steps to qualify on the ballot for the 2006 primary or general election,¹ nor did Senator Burns file any paperwork necessary to appear on the ballot until February 21, 2006.² Third, Conrad Burns did not formally kick-off his re-election campaign until April 9, 2006.³ Fourth, at the time the advertisement was aired, no Democrat had even declared an intention to run against Senator Burns. In sum, in August 2005 the MDP was not focusing on candidates for the next Senatorial election.

It is understood that the Federal Election Campaign Act provides a pre-BCRA definition of "candidate" to be any person who seeks nomination or election to a federal

¹ The MDP notes that, although unknown to it at the time, Senator Burns filed a Statement of Candidacy in March

² See Press Release of Conrad Burns at <http://www.conradburns.com/news/Read.aspx?ID=52>

³ <http://www.missoulian.com/articles/2006/04/10/news/top/news01.txt>

office and raises or spends in excess of \$5,000. 2 U.S.C. § 431(2). Read literally, this would make most, if not all, incumbent members of Congress candidates for their next election within days of their previous election. With respect to the sections applicable here, it would be difficult for someone sponsoring ads critical of an office holder to know if the office holder intended to run for re-election until he or she made a public announcement of their candidacy – as Senator Burns did on April 9, 2006. Thus, the pre-BCRA definition of “candidate” seems to add a gloss to the BCRA definition of federal election activity provision at issue in this matter that would make the provision permanent throughout the member’s term in Congress, even if that member’s next election is four or even six years away. This could not have been what Congress had intended. If it had, it should have added the term “individual holding Federal office” to the provision as it did in other sections of the Act. Of course, when Congress intended a provision of the BCRA to apply specifically to members of Congress in that capacity, it has done so explicitly. See e.g. 2 U.S.C. § 441i(e).

Therefore, we believe that the Commission should limit the application of section 431(20)(A)(iii) in a way that more properly regulates activity intended to influence a federal election. The Commission has taken such an approach in its interpretation of the term “in connection with an election in which a candidate for Federal office appears on the ballot,” a term which qualifies, temporally, other federal election activities. 2 U.S.C. § 431(20)(A)(ii); 11 C.F.R. § 100.24(a)(1). Under the Commission’s regulations, as a general matter, campaign activity regulated under this statutory provision is considered “Federal election activity” no earlier than January 1st of the election year or the earliest deadline for ballot qualification for the state in which the expenditure is made. For the 2006 cycle, this window did not begin in Montana until March 23, 2006; over eight months after the ads were aired. Thus, the Commission should take a similar approach with respect to section 431(20)(A)(iii) to ensure that communications made well before the election are not inadvertently ensnared in a regulatory scheme that is designed to regulate campaign activities that occur during the year of a federal election. In the alternative, the Commission should clarify for the regulated community the exact standard that should be used to determine when a person is a “candidate” for the purpose of this regulation, and what objective standards the regulated community can use (i.e. Filing of Statement of Candidacy or perhaps a specific number of days or months before an election) to know when the regulation is in effect.⁴

4. Recent Actions taken by the MDP

In recent months, the MDP has taken several actions to ensure that it is in full compliance with the FECA and the provisions of the BCRA. First, it has hired a Virginia based compliance consulting firm to ensure that its reports are filed accurately and timely. This firm is headed by a former comptroller of state parties and former Compliance Director of the Democratic National Committee. Second, the MDP has permanently switched its filing frequency from quarterly to monthly. This will ensure that any “federal election activity” undertaken in the future by the MDP is disclosed on a monthly basis. Third, notwithstanding its belief that the ads in question in this matter may not be a “federal election activity,” the MDP has amended its 2005 Year-End Report to disclose all

⁴ It should be noted that most members of Congress do not file their formal “Statement of Candidacy” with the Commission until months, or even years, after raising \$5,000 in connection with their next election

advertising activity that referenced Senator Burns as Federal election activity. As already mentioned, MDP has hired an experienced Executive Director.

5. Commission Enforcement Policy Regarding Enforcement of Section 434(e)

The passage of the BCRA has presented significant challenges to state party committees. Not only has the law placed significant financial constraints on party committees, but it also established several new, complicated rules for party committees, which include new, complex reporting requirements, as well as significant restrictions on how a party committee may raise and spend its funds. In recognition of these complications, it is our understanding that the Commission has taken a lenient approach to the enforcement of several provisions of the BCRA in the initial election cycles for which this law is in effect. With respect to the issues presented in this matter, this appears to be one instance in which this is the case. For example, in a recent letter to the Idaho Democratic Party (attached as Exhibit B), the Commission noted that the committee may have triggered monthly filing requirements by spending in excess of \$5,000 in connection with federal election activity during the second half of 2005. Rather than threatening enforcement for this oversight, the Commission's letter merely requests: "Please comply with the monthly filing schedule for reports covering activity during calendar year 2006 when your committee raises or spends funds for Federal election activity." Federal Election Commission Letter of March 31, 2006 to Stephanie Astorquia, Treasurer, Idaho Democratic Party, p.3. As stated above, the MDP has already switched to a monthly filing schedule.

Moreover, even if there was a violation here, no voters were harmed or misled and no elections were influenced by the failure to file monthly reports. All of the funds expended for the ads were raised and spent pursuant to the provisions of the Act. All of the expenditures were disclosed in the next filing under the quarterly filing rules, which occurred five months before the primary election and over nine months before the general election. MDP made no attempt to hide anything, but rather, merely continued to file accurate, timely quarterly reports. The confluence of events that caused the allegations was unusual, and now that MDP is filing monthly, the alleged violation will never happen again.

B. Payment of Salary for Jim Farrell

The complaint alleges, without providing any factual support, that the salary of Jim Farrell, the new Executive Director for the MDP, should have been paid with federal funds. To this end, the complaint alleges this solely on the complainants "belief" that "it is impossible that Mr. Farrell has spent less than 25% of his time per month on Federal election activity." The FECA, at 2 U.S.C. § 431(20)(A)(iv) considers the payment of an employee's salary to be a Federal election activity if that employee spends in excess of 25% of their time in a given month on activities in connection with a Federal election. Commission regulations that implement this provision require any employee that spends in excess of 25% of their time on Federal elections or Federal election activity to be paid exclusively with federal funds. Under regulations in effect during 2005, any employee that worked 25% or less of their time in connection with a federal election was to be paid exclusively with funds that comply with state law. 11 C.F.R. § 300.33(c)(2).

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On its face, this allegation fails to meet the minimum threshold necessary to allege a violation of the FECA. 11 C.F.R. § 111.4(d)(3) requires that a complaint “contain a clear and concise recitation of the facts which describe a violation of a statute or regulation over which the Commission has jurisdiction.” Similarly, in MUR 4690, the Commission opined that it “may find “reason to believe” only if a complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the FECA. Unwarranted legal conclusions from asserted facts [citation omitted] or mere speculation [citation omitted] will not be accepted as true. Statement of Reasons of Commissioners Mason, Sandstrom, Smith and Thomas, MUR 4960 (December 21, 2000), p.1-2. Furthermore, “a complaint may be dismissed if it consists of factual allegations that are refuted with sufficiently compelling evidence provided in the response to the complaint [citation omitted]” Id. at 2.

In this matter, the unsubstantiated allegations made in the complaint are clearly refuted by the facts.⁵ Contrary to the complaint’s assertion, Mr. Farrell did not spend in excess of 25% of his time in any month during 2005 on activities in connection with Federal election or Federal election activity. As a newly hired Executive Director in September 2005, Mr. Farrell spent the overwhelming amount of his time working to rebuild the party’s staff and infrastructure. Rather than focusing on federal elections, Mr. Farrell’s primary focus was to support the agenda of the non-federal Democratic incumbent officeholders such as Governor Brian Schweitzer and Attorney General Mike McGrath. In fact, during 2005, no clear Democratic contender had even emerged to challenge Senator Burns. Therefore, the party had no reason to spend any of its time on activity in connection with the race. As of the time of this letter, the Democratic Party is expected to have a contested primary for the Democratic nomination for U.S. Senator. Therefore, the party will likely not directly intervene in this race until after the Democratic primary on June 6, 2006.

In rebuttal to the complaint’s assertion, a signed declaration from Mr. Farrell is enclosed as Exhibit A. The declaration demonstrates that the overwhelming majority of Mr. Farrell’s time was spent on rebuilding the party’s operation and supporting the agenda of the non-federal incumbent officeholders in Montana. Therefore, the complaint’s unsupported assertion that Mr. Farrell was spending more than 25% of his time on “the Senate race in Montana over the previous six months” (Complaint Allegation 10) and his salary should have been paid for with federal funds is completely without merit and should be dismissed.

CONCLUSION

The BCRA has established an incredibly difficult maze of regulation for smaller state party committees to comply with. These difficulties are only compounded when the

⁵ The complainant Charles Denowh is the executive director of the Montana Republican Party and asserts that his allegation is “[b]ased on [his] knowledge of the duties of a state party executive director and the amount of activity the Montana State Democratic Central Committee has had in the Senate race I Montana over the last six months ” Complaint allegation 10 Mr Denowh only describes his knowledge of the duties of the Republican , not Democratic, party executive director. He does not describe the activities related to the Senate race in Montana and cannot know how Mr Farrell spent his time Thus, Mr Denowh is merely speculating, perhaps based on his own experience and time spent supporting Senator Burns, but not offering any facts to support his assertions about Mr. Farrell’s activities

staff that have invested significant time in learning the provisions of the BCRA leave the organization. In this instance, the Committee was asked to air an ad within days of an election of a new chair. Without the benefit of experienced staff to guide him, he was seemingly unaware of any potential legal consequences of filing quarterly instead of monthly reports that would have stemmed from running such an ad so far ahead of the election. Admirably, the Chair has taken extraordinary steps, and has spent considerable resources, to ensure that his organization is in compliance with the FECA as it enters the 2006 campaign year. The Montana Republican Party filed this complaint several months after the ads were aired, and only after the MDP had already disclosed the activity to the FEC. Thus, the payment for the advertisements were disclosed (1) well before Senator Burns attempted to qualify for the ballot; (2) well before Senator Burns "kicked-off" his campaign; and (3) several months before Senator Burns primary or general election. Furthermore, the advertisements were properly paid for with funds that were subject to the prohibitions and limitations of federal law.

With respect to the complaint's allegations with regards to Mr. Farrell's salary, the allegations failed to sufficiently state facts that could lead to a conclusion that a violation of the law has occurred. Nevertheless, Mr. Farrell's declaration clearly demonstrates that he did not spend in excess of 25% of his time in any given month in connection with federal elections or Federal election activity during 2005.

For the reasons stated above, the Commission should take no further action and close the file in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Neil P. Reiff".

Neil P. Reiff

Stephen E. Hershkowitz

Counsel to the Montana State Democratic Central
Committee

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Exhibit A

MUR 5714



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**BEFORE THE
FEDERAL ELECTION COMMISSION**

Montana State Democratic Central Committee

and

Brenda Schye, as Treasurer

MUR 5714

DECLARATION OF JIM FARRELL

1. I am the Executive Director of the Montana State Democratic Central Committee ("MDP"). I have held this position since September 6, 2005.

2. As a general matter, my job as Executive Director entailed the following responsibilities:

- a. Recruited and worked with state party staff to build party infrastructure, including development of long range strategic planning and rebuilding of technical tools for the party.
- b. Supervision of MDP staff on a daily basis as well as oversight of day-to-day operations of the MDP.
- c. Organized party meetings and Conferences.
- d. Worked with state chair and state central committee to develop long range budget for the party

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- e. Acted as a liaison with other Democratic party organizations, including Montana county central committees, the Democratic National Committee and the Association of State Democratic Chairs.
- f. Recruited legislative candidates for 125 state legislative races throughout Montana in 2006.
- g. Assisted the development and delivery of a coordinated policy message for non-federal statewide officeholders.

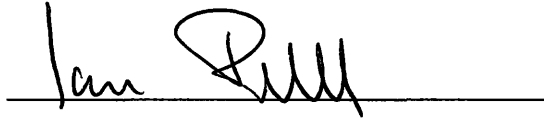
3. During 2005, I did not spend in excess of 25% of any given month on activities in connection with a federal election or Federal election activity for the following reasons:

- a. Any activity undertaken in connection with Senator Burns would have been limited to discussion with Montana reporters regarding his job performance as a United States Senator. This activity required a very limited amount of my time.
- b. Since there were no declared Democratic candidates for Senator during the 2005 calendar year, there was very limited long range planning undertaken with respect to the Senate race during 2005. Such planning or any other federal activity in connection with the Senate election, if any, will likely not occur until the party has a nominee in June 2006.
- c. With respect to the At-Large Member of the United States House of Representatives from Montana, I may have responded to a few press calls during 2005 regarding the Republican incumbent Representative

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Denny Rehberg. Other than the press calls, I do not recall undertaking any other activity in connection with the election for U.S. House of Representatives.

I declare under penalties of perjury that the foregoing is true and correct to the best of my present knowledge, information and belief. Dated this 24th day of April, 2006.

A handwritten signature in black ink, appearing to read "Jim Farrell", is written over a horizontal line.

Jim Farrell

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Exhibit B

MUR 5714





FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

RQ-2

March 31, 2006

Stephanic Astorquia, Treasurer
Idaho Democratic Party
PO Box 445
Boise, ID 83701

Response Due Date:
May 1, 2006

Identification Number: C00010439

Reference: Year End Report (07/01/05-12/31/05)

Dear Ms. Astorquia:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above. An itemization of the information needed follows:**

-Schedule A of your report (see attached) discloses one or more contributions from an organization(s), which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible.

To the extent that your committee has received prohibited funds, you may

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have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR §103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Schedule B supporting Line 21(b) of your report discloses a payment(s) totaling \$5,786.25 for "postage" and "printing." Expenditures and disbursements for public communications (as defined under 11 CFR §100.26) that refer to a clearly identified candidate for Federal office and that promote, support, attack or oppose any candidate for Federal office, meet the definition of Federal Election Activity under 11 CFR §100.24 and should be disclosed on Schedule B for Line 30(b) along with the identity of the candidate(s).

Further, public communications that meet the definition of Federal Election Activity and that also contain express advocacy as defined under 11 CFR §100.22, but do not meet the conditions of exempt activity, would constitute an in-kind contribution, an independent expenditure or a coordinated party expenditure and should be properly disclosed on a Schedule B, E or F supporting Lines 23, 24 or 25, as appropriate, rather than on Schedule B for Line 30(b). Please clarify if this activity meets the definition of Federal Election Activity or if it contains express advocacy and amend your report to properly disclose this activity, if necessary.

-Please clarify all expenditures made for "Event Catering," "Facility Rent,"

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and "Facility Rental" on Schedule(s) B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E, or F supporting Lines 23, 24, or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Please clarify all expenditures made for "polling" on Schedule(s) B. If a portion or all of these expenditures were made for activity that promotes or opposes a Federal candidate, but does not qualify as exempt party activity, this amount should be disclosed on Schedule B or F supporting Lines 23 or 25. 11 CFR §§104.3(b), 104.17(a) and 106.1

-Your report discloses activity that indicates your committee has raised or spent funds for Federal Election Activity as defined at 11 CFR §100.24. Please be advised that as a result of this activity, your committee is required to file reports under a monthly filing schedule. Please comply with the monthly filing schedule for reports covering activity during calendar year 2006 when your committee raises or spends funds for Federal Election Activity. 11 CFR §§104.5(c)(3) and 300.36(c)(1)

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions from Other Political Committees should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1139.

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Sincerely,



Karen E. Trainer
Campaign Finance Analyst
Reports Analysis Division

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Contributor Name	Date	Amount
Committee To Elect Bert Marley	10/21/2005	\$1,000.00
Committee to Elect David Langhorst	12/20/2005	\$500.00
Committee to Elect D Boe	10/6/2005	\$250.00
Committee to Elect Edgar Malepsai	11/15/2005	\$500.00
Committee to Elect Blaine Smith	10/28/2005	\$250.00
Committee to Elect Elmer Martinez	10/6/2005	\$500.00
Committee to Elect Nicole LeFavour	7/18/2005	\$300.00
Committee to Elect Nicole LeFavour	10/6/2005	\$500.00
Committee to Reelect Wendy Jaquet	10/28/2005	\$250.00
Idaho Democratic Women's Caucus	7/21/2005	\$500.00
Kelly for Senate	11/2/2005	\$250.00
Margaret Henbest, For Representative	7/8/2005	\$250.00
Margaret Henbest, For Representative	11/2/2005	\$250.00
Mike Mitchell Campaign	10/6/2005	\$250.00
Sayler for Representative	8/17/2005	\$500.00
SEIU-Public Employees PAC	8/17/2005	\$500.00
House Democrats	10/6/2005	\$5,000.00

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